

Exhibit 662

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

Congress of the United States

House of Representatives

COMMITTEE ON OVERSIGHT AND REFORM

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Opening Statement

Chairman Raja Krishnamoorthi**Hearing on “Examining JUUL’s Role in the Youth Nicotine Epidemic: Part I”****July 24, 2019**

After years of steady decline, youth nicotine use has suddenly reversed course, seemingly overnight. Between 2017 and 2018, youth e-cigarette use, also known as vaping, rose 78% to the point where over 20% of high school students vape.

The lingering question is: why? And what was the role of JUUL, the country’s dominant maker of e-cigarettes with almost 80% of e-cigarette market share, in the dramatic rise in vaping?

The panel assembled today will help us address these questions, and frame our discussion for part 2 of this hearing here tomorrow at 2:00 pm when JUUL Founder James Monsees will testify.

Today, we will examine what exactly about JUUL’s advertising and marketing made it irresistible to kids. Doctor Robert Jackler, the preeminent tobacco advertising scholar in the country, will help us answer that question. After today, we hope to understand how JUUL appealed to youth while simultaneously avoiding detection by adults.

We will hear about JUUL’s efforts to market directly to kids, including how JUUL entered schools under the guise of anti-vaping presentations. Then after all school personnel left the assembly room, told the kids JUUL is safe.

We will hear from the parents of kids who sat through one such presentation. Two devoted mothers were so angry that they founded a nation-wide advocacy group. I suspect that of all the schools JUUL entered, it regrets going into that one the most, because it incited the righteous anger that only comes from parents who feel that their kids were being exploited.

We will also hear that JUUL’s targeting of vulnerable populations was not limited to kids. Rae O’Leary will describe JUUL’s attempts to test its product on Native Americans. JUUL tried to pay her tribe to give free JUUL starter kits to tribal members. JUUL told the tribe that its product is healthy, and proposed pushing it through the Tribe’s medical professionals. JUUL appeared to think it could get away with this on tribal land. And it tried to ensure no one else found out about it.

The JUUL product itself contains very high nicotine levels – three to six times the amount of the e-cigarettes that came before it. Its formulation eliminated the harsh taste that would’ve previously accompanied that much nicotine, and further masked it with flavors, which appeal to youth.

Kids do not grasp this. 63% of users aged 15 to 24 do not know JUUL contains nicotine. They think that it only has flavorings, and mistakenly believe that the product is not harmful. Doctor Winickoff will help to explain the health impact of youth JUUL use.

Perhaps we can better understand what led to parents sending JUUL letters like one from June of last year stating, quote “My daughter is highly addicted to the nicotine in JUULing. It is very sad and occurred very quickly over the past several months. She is 16 and now has addictive behaviors that she never had before JUULing (stealing money and other teens’ JUULs), lying, and sneaking out at night to get a nicotine fix.”

Perhaps we can understand why a therapist wrote to JUUL in July of last year disheartened at how many of her teen clients came to her about JUUL addiction, talking about how quote “desperately they need to vape.” She expressed concern about kids using JUUL to quote “self-medicate from mental health issues like anxiety and depression.”

We will also examine what about the JUUL device makes it so attractive to teens. It is discreet in a way that no cigarettes or prior e-cigarettes were. It puts off a limited cloud of aerosol, and its smell doesn’t linger. It’s small. And before JUUL was a household name, parents could have looked right past it, thinking it was a thumb drive. [Reveal] In fact, I’ve had one in my hand during this entire statement.

JUUL hasn’t provided satisfactory answers for these open questions. It is my sincere hope that our hearings today and tomorrow will help us better understand JUUL’s role in this terrible epidemic, and point us towards solutions to prevent teen vaping addiction.

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